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Of Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

NORMAN ALAN RICE and MONIKA)
GÄRTNER,)

Plaintiffs)

v.)

GINA LINDA AMBROCIO; CARL G.)
ANDERSON; JOHN WILLIAM)
ANDERSON; ARTEMIS LINK LLC;)
MICHAEL BENNETT; BITE ONE”S LIP,)
LLC dba DEANZ GREENZ; BORNSTEDT,)
LLC dba LIFESTYLE FARMS; DAVID)
GARRETT BROWN; FELIX FRANKLIN)
BROWN, JR.; DEAN BRUNDIDGE;)
RACHEL BUCKEY-HALL aka RACHEL)
BUCKEY HALL; DALE ROBERT)
BURKHOLDER; RAMON MALDONADO)
CASTILLO aka MALDONADO RAMON)
CASTILLO; MATTHEW CHEATLE;)
CHRISTOPHER W. EASTMAN; JERALD)
ALAN EISERT; AARON FRANKEL;)
KATHLEEN ALEXANDER GIBSON aka)
KATHI A. GIBSON; CHERYL ANN)
GORDON-DOLLAR; RAYMOND)

Case No. 3:18-cv-00875-MO

FIRST AMENDED COMPLAINT

For Violation of
18 USC § 1962 and Private
Nuisance

EUGENE HALL; COLIN EDWARD)
HOBBS; WHITNEY AMANDA HOBBS;)
STACEY KELLEY; JOSHUA CHARLES)
EDWARD LINGLE; LINDA K. LONG;)
JUSTIN MARK MANNS; MATTHEW)
MARTIN; HEIDI MARIE MAXWELL;)
GARY MEAD MCDONALD; JOEL)
EDWARD MCMAHON; OREGON'S)
BEST MEDS, LLC dba OREGON'S BEST)
BUDS; ALANA LEE OTNESS; LISA)
ROCKDASCHEL; STEVEN ANTHONY)
SCARDINO; AARON BRET SHELLEY;)
JILL NICOLE SHELLEY; RACHELLE)
SIVERTSON; TODD ALLEN)
SIVERTSON; TAMMY ANNE ST. JOHN;)
TAS INVESTMENTS, LLC; DAVID)
ALBERT TYSON; VESSEL, INC. dba)
VESSEL; ANDREW RYAN WEITZ;)
ANNETTE CORINE ANDERSON aka)
ANNETTE CORINE CRAWFORD;)
ATTIKUS ENTERPRISES, INC. dba IVY)
CANNABIS; DAVID NEAL)
SCHWIMMER and MATTHEW CORREY)
SCHWIMMER,)
)
Defendants)

COME NOW, Plaintiffs Norman Alan Rice and Monika Gärtner (“Plaintiffs”), and hereby allege as follows.

INTRODUCTION

1.

Plaintiffs are Oregon property owners who live immediately adjacent to the former Mt. Hood Equestrian Center located at 29450 SE Lariat Lane in Boring, Oregon (“Lariat Lane Property”). Plaintiffs have been damaged by a criminal enterprise (the “Marijuana Operation”) producing and processing marijuana at the Lariat Lane Property and other properties, and then trafficking that marijuana. Plaintiffs seek redress under the Racketeer Influenced and Corrupt Organizations Act (“RICO”), which requires those who engage in racketeering activity, including the production and sale of marijuana as a controlled substance, to pay treble damages, reasonable attorneys’ fees and costs to those whom they injure. Plaintiffs also seek damages for private nuisance.

JURISDICTION AND VENUE

2.

Pursuant to 28 U.S.C. § 1331, this Court has original jurisdiction over claims brought under 18 U.S.C. § 1964.

3.

Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b)(2) because the events giving rise to this action took place in, and continue to take place in, Clackamas County, Oregon.

PARTIES

4.

Plaintiffs are each natural persons who own and reside on real property located at 29440 SE Lariat Lane, Boring, Oregon (“Plaintiffs’ Property”).

5.

Defendant Gina Linda Ambrocio (“Defendant Ambrocio”) is a natural person resident in Portland, Oregon. As further described herein, Defendant Ambrocio produced marijuana on the Lariat Lane Property for the Marijuana Operation, facilitated the trafficking of marijuana produced by the Marijuana Operation and knowingly received proceeds from such trafficking.

6.

Defendant Carl G. Anderson (“Defendant Carl Anderson”) is a natural person resident in Gresham, Oregon. As further described herein, Defendant Carl Anderson produced marijuana on the Lariat Lane Property for the Marijuana Operation, facilitated the trafficking of marijuana produced by the Marijuana Operation and knowingly received proceeds from such trafficking.

7.

Defendant John William Anderson (“Defendant John Anderson”) is a natural person resident in Gresham, Oregon. As further described herein, Defendant John Anderson trafficked marijuana produced by the Marijuana Operation, including marijuana produced on the Lariat Lane Property, and knowingly received proceeds from such trafficking.

8.

Defendant Artemis Link LLC (“Defendant Artemis”) is an Oregon limited liability

company with its principal place of business in Beaverton, Oregon. As further described herein, Defendant Artemis trafficked marijuana produced by the Marijuana Operation, including marijuana produced on the Lariat Lane Property, and knowingly received proceeds from such trafficking.

9.

Defendant Michael Bennett (“Defendant Bennett”) is a natural person resident in Cottage Grove, Oregon. As further described herein, Defendant Bennett trafficked marijuana produced by the Marijuana Operation, including marijuana produced on the Lariat Lane Property, and knowingly received proceeds from such trafficking.

10.

Defendant Bite One”s (sic) Lip, LLC (“Defendant BOL”) is an Oregon limited liability company with its principal place of business in Portland, Oregon. At all relevant times, Defendant BOL did business as Deanz Greenz, an assumed business name registered with the Oregon Secretary of State. As further described herein, Defendant BOL trafficked marijuana produced by the Marijuana Operation, including marijuana produced on the Lariat Lane Property, and knowingly received proceeds from such trafficking.

11.

Defendant Bornstedt, LLC (“Defendant Bornstedt”) is an Oregon limited liability company with its principal place of business in Sandy, Oregon. At all relevant times, Defendant Bornstedt did business as LifeStyle Farms, an assumed business name registered with the Oregon Secretary of State. As further described herein, Defendant Bornstedt produced and processed marijuana and marijuana concentrates for the Marijuana Operation on the Lariat Lane Property

and other properties and knowingly received proceeds from the trafficking of marijuana by the Marijuana Operation.

12.

Defendant David Garrett Brown (“Defendant David Brown”) is a natural person resident in Portland, Oregon. As further described herein, Defendant David Brown trafficked marijuana for the Marijuana Operation, including marijuana produced on the Lariat Lane Property, and knowingly received proceeds from such trafficking.

13.

Defendant Felix Franklin Brown, Jr. (“Defendant Felix Brown”) is a natural person resident in Scappoose, Oregon. As further described herein, Defendant Felix Brown produced marijuana on the Lariat Lane Property for the Marijuana Operation, facilitated the trafficking of marijuana by the Marijuana Operation and knowingly received proceeds from such trafficking.

14.

Defendant Dean Brundidge (“Defendant Brundidge”) is a natural person resident in Portland, Oregon. As further described herein, Defendant Brundidge trafficked marijuana for the Marijuana Operation, including marijuana produced on the Lariat Lane Property, and knowingly received proceeds from such trafficking.

15.

Defendant Rachel Buckey-Hall, aka Rachel Buckey Hall (“Defendant Buckey-Hall”), is a natural person resident in Gresham, Oregon. As further described herein, Defendant Buckey-Hall produced marijuana on the Lariat Lane Property for the Marijuana Operation, facilitated the trafficking of marijuana by the Marijuana Operation and knowingly received proceeds from such

trafficking.

16.

Defendant Dale Robert Burkholder (“Defendant Burkholder”) is a natural person resident in Gresham, Oregon. As further described herein, Defendant Burkholder developed the Lariat Lane Property for the production of marijuana by the Marijuana Operation, managed the Marijuana Operation, made financial investments in the Marijuana Operation, and knowingly received proceeds from the trafficking of marijuana by the Marijuana Operation.

17.

Defendant Ramon Maldonado Castillo, aka Maldonado Ramon Castillo (“Defendant Castillo”), is a natural person resident in Portland, Oregon. As further described herein, Defendant Castillo produced marijuana on the Lariat Lane Property for the Marijuana Operation, facilitated the trafficking of marijuana by the Marijuana Operation and knowingly received proceeds from such trafficking.

18.

Defendant Matthew Cheatle (“Defendant Cheatle”) is a natural person resident in San Diego, California. As further described herein, Defendant Cheatle developed the Lariat Lane Property for the production of marijuana by the Marijuana Operation, made financial investments in the Marijuana Operation, produced marijuana for the Marijuana Operation on the Lariat Lane Property, and knowingly received proceeds from the trafficking of marijuana produced by the Marijuana Operation.

19.

Defendant Christopher W. Eastman (“Defendant Eastman”) is a natural person resident in

Boring, Oregon. As further described herein, Defendant Eastman produced marijuana on the Lariat Lane Property for the Marijuana Operation, facilitated the trafficking of marijuana by the Marijuana Operation and knowingly received proceeds from such trafficking.

20.

Defendant Jerald Alan Eisert (“Defendant Eisert”) is a natural person resident in Boring, Oregon. As further described herein, Defendant Eisert produced marijuana on the Lariat Lane Property for the Marijuana Operation, facilitated the trafficking of marijuana by the Marijuana Operation and knowingly received proceeds from such trafficking.

21.

Defendant Aaron Frankel (“Defendant Frankel”) is a natural person resident in Portland, Oregon. As further described herein, Defendant Frankel trafficked marijuana produced by the Marijuana Operation, including marijuana produced on the Lariat Lane Property, and knowingly received proceeds from such trafficking.

22.

Defendant Kathleen Alexander Gibson, aka Kathi A. Gibson (“Defendant Gibson”), is a natural person resident in Portland, Oregon. As further described herein, Defendant Gibson produced marijuana on the Lariat Lane Property for the Marijuana Operation, facilitated the trafficking of marijuana by the Marijuana Operation and knowingly received proceeds from such trafficking.

23.

Defendant Cheryl Ann Gordon-Dollar (“Defendant Gordon-Dollar”) is a natural person resident in Newberg, Oregon. As further described herein, Defendant Gordon-Dollar facilitated

the trafficking of marijuana by the Marijuana Operation, including marijuana produced on the Lariat Lane Property, and knowingly received proceeds from such trafficking.

24.

Defendant Raymond Eugene Hall (“Defendant Hall”) is a natural person resident in Gresham, Oregon. As further described herein, Defendant Hall facilitated the trafficking of marijuana by the Marijuana Operation, including marijuana produced on the Lariat Lane Property, and knowingly received proceeds from such trafficking.

25.

Defendant Colin Edward Hobbs (“Defendant Colin Hobbs”) is a natural person resident in Lake Oswego, Oregon. As further described herein, Defendant Colin Hobbs trafficked marijuana produced by the Marijuana Operation, including marijuana produced on the Lariat Lane Property, and knowingly received proceeds from such trafficking.

26.

Defendant Whitney Amanda Hobbs (“Defendant Amanda Hobbs”) is a natural person resident in Beaverton, Oregon. As further described herein, Defendant Whitney Hobbs trafficked marijuana produced by the Marijuana Operation, including marijuana produced on the Lariat Lane Property, and knowingly received proceeds from such trafficking.

27.

Defendant Stacey Kelley (“Defendant Kelley”) is a natural person resident in Eugene, Oregon. As further described herein, Defendant Kelley developed the Lariat Lane Property for the production of marijuana by the Marijuana Operation, made financial investments in the Marijuana Operation, produced marijuana on the Lariat Lane Property for the Marijuana

Operation, and knowingly received proceeds from the trafficking of marijuana by the Marijuana Operation.

28.

Defendant Joshua Charles Edward Lingle (“Defendant Lingle”) is a natural person resident in Sandy, Oregon. As further described herein, Defendant Lingle facilitated the trafficking of marijuana by the Marijuana Operation, including marijuana produced on the Lariat Lane Property, and knowingly received proceeds from such trafficking.

29.

Defendant Linda K. Long (“Defendant Long”) is a natural person resident in Sandy, Oregon. As further described herein, Defendant Long facilitated the trafficking of marijuana by the Marijuana Operation, including marijuana produced on the Lariat Lane Property, and knowingly received proceeds from such trafficking.

30.

Defendant Justin Mark Manns (“Defendant Manns”) is a natural person resident in Santa Rosa, California. As further described herein, Defendant Manns trafficked marijuana produced by the Marijuana Operation, including marijuana produced on the Lariat Lane Property, and knowingly received proceeds from such trafficking.

31.

Defendant Matthew Martin (“Defendant Martin”) is a natural person resident in Portland, Oregon. As further described herein, Defendant Martin trafficked marijuana produced by the Marijuana Operation, including marijuana produced on the Lariat Lane Property, and knowingly received proceeds from such trafficking.